

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

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CASSANDRA M. WHAPLES,	:	
Plaintiff,	:	
	:	
- against -	:	C.A. No.: 1:18-cv-00528
	:	
SAFE HARBOR MARINAS LLC a/k/a	:	
SAFE HARBOR MARINAS; SHM	:	
GREENWICH BAY LLC; SHM BYYG LLC;	:	
SHM INTERNATIONAL MARINA GROUP I	:	
LLP; INTERNATIONAL MARINA GROUP	:	
LP; GREENWICH BAY ENTERPRISES, INC.	:	
a/k/a GREENWICH BAY ENTERPRISES LLC	:	
a/k/a BREWER GREENWICH BAY MARINA;	:	
and GRZEGORZ BARTOSZUK a/k/a	:	
GREGORY BARTOSZUK, individually,	:	
Defendants.	:	
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CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the following information applies to the various business Defendants:

1. Defendant SAFE HARBOR MARINAS LLC a/k/a SAFE HARBOR MARINAS has no parent and is not publicly traded and is a nongovernmental Delaware Limited Liability Company. There are members which own 10% or more of the Company but they are not publicly traded.

2. Defendants SHM GREENWICH BAY LLC, f/k/a GREENWICH BAY ENTERPRISES, INC., f/k/a GREENWICH BAY ENTERPRISES LLC, d/b/a BREWER GREENWICH BAY MARINA are 100% owned by SHM BYYG INTERMEDIATE, LLC, which in turn is 100% owned by Defendant SHM BYYG LLC, which in turn is 100% owned by Defendant SAFE HARBOR MARINAS LLC. These

entities are not publicly traded and are nongovernmental Delaware Limited Liability Companies.

3. Defendant INTERNATIONAL MARINA GROUP LP is not a part of SAFE HARBOR MARINAS, LLC.

4. Defendant INTERNATIONAL MARINA GROUP I LP¹ is a nongovernmental Limited Partnership existing under the laws of the State of Texas, is 99% owned by Defendant SAFE HARBORS MARINAS, LLC and 1% owned by SHM IMG GP, LLC, which is also 100% owned by SAFE HARBORS MARINAS, LLC. These entities are not publicly traded.

Respectfully submitted,
JACKSON LEWIS P.C.
44 South Broadway, 14th Floor
White Plains, New York 10601
Telephone: (914) 872-6872

By: /s/ Anthony J. DiOrio
Anthony J. DiOrio (#3419)

ATTORNEYS FOR DEFENDANTS

Dated: September 28, 2018

¹ Incorrectly named by Plaintiff as SHM INTERNATIONAL MARINA GROUP I LLP.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that Defendant's Rule 7.1 Statement has been filed electronically and that it is available for viewing and downloading from the ECF system, this 28 day of September, 2018.

/s/ Anthony J. DiOrio

Anthony J. DiOrio